

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 19-MJ-6087-MPK
	)	
GREGORY ABBOT et al.,	)	
Defendants	)	
_____	)	

**DEFENDANT ROBERT ZANGRILLO’S MOTION TO PERMIT SPECIFIC AND  
LIMITED INTERNATIONAL BUSINESS TRAVEL TO MONTREAL CANADA**

Now comes the defendant Robert Zangrillo, by and through undersigned counsel, and hereby respectfully moves this Honorable Court to permit him to attend pre-planned business meetings in Montreal from April 1-3 of this year.

On March 12, 2019, Mr. Zangrillo appeared in U.S. District Court for the Southern District of Florida in response to a complaint charging him with one count of conspiracy to commit mail fraud and honest services mail fraud. Chief U.S. Magistrate Judge John J. O’Sullivan ordered Mr. Zangrillo released on \$500,000 bond. The Court also ordered Mr. Zangrillo to “[s]urrender all passports and travel documents” and restricted his business travel to the “continental U.S.” *United States v. Zangrillo*, No. 19-MJ-2297 (S.D. Fla.), Dkt. 6.

For the past five years, Mr. Zangrillo has been employed by a private investment firm focused on venture capital and real estate investments. Mr. Zangrillo is currently involved in a proposed eight million square foot mixed use development in the Little Haiti neighborhood of Miami. The project is proposing a \$31 million donation to the Little Haiti Community

Revitalization Trust, which would represent the largest community benefits package ever to be donated to the city of Miami. There are pre-planned strategic offsite meetings regarding this project including one scheduled to take place April 1-3 of this year in Montreal, where one of the development's principal partners and tenants and that partner's creative team is based. Mr. Zangrillo's personal attendance at these meetings is expected by the partners and would further the project's success.

Mr. Zangrillo does not present any flight or dangerousness risk. He has lived in the Miami area since 2010 and currently owns a home in Miami Beach. Mr. Zangrillo is fifty-two years old, has three daughters, has had no prior convictions and no interactions with the criminal justice system for more than thirty years, has elderly parents both living in Connecticut, and has retained the undersigned and additional co-counsel to contest the current allegations.

For the foregoing reasons, Mr. Zangrillo respectfully requests that he be permitted to attend the upcoming meetings in Montreal. Before doing so, he would need to re-acquire his passport; after doing so, he will return his passport to pre-trial services. Mr. Zangrillo alternatively requests that the Court issue a bail order setting forth travel conditions similar to those imposed on another co-defendant, Douglas Hodge, in this case. *See* Dkt. 17.

**WHEREFORE**, the defendant respectfully requests that the instant motion be allowed.

**Local Rule 7.1(a)(2) Certification**

The undersigned counsel conferred with counsel for the Government and the Government opposes this motion. Pre-trial services has taken no position as of the time of the filing.

Respectfully submitted,

Robert Zangrillo

By his Attorneys,

**/s/ Martin G. Weinberg**

Martin G. Weinberg

Mass. Bar No. 519480

20 Park Plaza, Suite 1000

Boston, MA 02116

(617) 227-3700

owlmgw@att.net

**/s/ Nicholas Theodorou**

Nicholas Theodorou

Foley Hoag LLP

155 Seaport Boulevard

Boston, MA 02210

(617) 832-1163

ntheodorou@foleyhoag.com

**/s/ Matthew L. Schwartz**

Matthew L. Schwartz

Boies Schiller Flexner

55 Hudson Yards, 20th Floor

New York, NY 1001

(212) 303-3646

mlschwartz@bsfllp.com

Dated: March 28, 2019

**CERTIFICATE OF SERVICE**

I, Martin G. Weinberg, hereby certify that on this date, March 28, 2019, a copy of the foregoing document has been served via Electronic Court Filing system on all registered participants.

**/s/ Martin G. Weinberg**

Martin G. Weinberg